

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

SHENEA JAMES as administrator of the estate Of  
DEDRICK JAMES, deceased, and SHENEA JAMES,  
individually,

Plaintiff,

-against-

THE UNITED STATES OF AMERICA, CITY OF  
ROCHESTER, RPD INVESTIGATOR RICHARD  
ARROWOOD, et al.

Defendants.

**23-cv-6057 (MAV)(MJP)**

**NOTICE OF MOTION  
TO TEMPORARILY  
SEAL**

**PLEASE TAKE NOTICE** that upon the Declaration of Elliot D. Shields, dated July 17, 2025, the memorandum of law submitted herewith, and all exhibits and documents filed under seal for in camera review pursuant to Local Rule 5.3 of the Local Rules of Civil Procedure of the Western District of New York, Plaintiff will move this Court before the Honorable Meredith A. Vacca, at the United States Courthouse, 100 State Street, Rochester, New York, on a date and time to be determined by the Court, for an order:

1. Pursuant to WDNY Local Rule 5.3, temporarily sealing Exhibits D, E, H, and I to Plaintiff's memorandum of law and Rule 56.1 counterstatement, and temporarily sealing the unredacted versions of those filings, solely due to the Government's confidentiality designations under the Protective Order (ECF No. 36); and
2. Temporarily sealing the redacted portions of the Memorandum of Law and Rule 56.1 Counterstatement filed in opposition to the United States of America's motion to for summary judgment, filed at ECF 63
3. Granting such other and further relief as the Court deems just and proper.

Dated: New York, New York  
July 18, 2025

Respectfully Submitted,  
ROTH & ROTH LLP

By: ~s/~  
Elliot Dolby Shields, Esq.  
*Co-Counsel for Plaintiff*  
192 Lexington Ave, Suite 802 New  
York, New York 10016  
Ph: (212) 425-1020

To: All counsel of record